

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BRICKMAN INVESTMENTS INC., On	:	Civil Action No. 1:07-cv-03455-RJH
Behalf of Itself and All Others Similarly	:	
Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
ALLOT COMMUNICATIONS LTD., et al.,	:	
	:	
Defendants.	:	
	:	
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GERALD BILGER, Individually and On	:	Civil Action No. 1:07-cv-03815-RJH
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
ALLOT COMMUNICATIONS LTD., et al.,	:	
	:	
Defendants.	:	
	:	
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[Caption continued on following page.]

DECLARATION OF MARIO ALBA JR. IN FURTHER SUPPORT OF THE MOTION OF
BRICKMAN INVESTMENTS INC. AND JOHN SPITZ FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFFS AND FOR APPROVAL OF SELECTION OF
LEAD COUNSEL AND IN OPPOSITION TO THE COMPETING MOTIONS

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ELIYAHU MOKHTAR, Individually and On	:	Civil Action No. 1:07-cv-05456-RJH
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
ALLOT COMMUNICATIONS LTD., et al.,	:	
	:	
Defendants.	:	
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SHANNON VINSON, Individually and On	:	Civil Action No. 1:07-CV-05457-RJH
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
ALLOT COMMUNICATIONS LTD., et al.,	:	
	:	
Defendants.	:	
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Mario Alba, Jr., declares under penalty of perjury:

1. I am an associate with Lerach Coughlin Stoia Geller Rudman & Robbins LLP (“Lerach Coughlin”), one of plaintiff’s counsel in the action entitled *Brickman Investments Inc. v. Allot Communications Ltd.*, et al., Civil Action No. 1:07-cv-03455-RJH (the “*Brickman Investments Action*”). I submit this Declaration in further support of the Motion of Brickman Investments Inc. and John Spitz for consolidation, appointment as Lead Plaintiffs and for approval of selection of Lead Counsel and in Opposition to the Competing Motions.

2. In accordance with the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §77z-1(a)(3)(A)(i), on May 1, 2007, my firm drafted a notice on behalf of plaintiff in the *Brickman Investments Action* and caused such notice to be published on *Business Wire*, a national, business-oriented newswire service (the "Notice"). The Notice advised investors of the pendency of this action and the opportunity for them to seek appointment as lead plaintiff in this action within the next 60 days.

3. On or about May 9, 2007, upon information and belief, investor Shichao Chen saw this notice on the internet, which included a link that directed him to my firm’s website, www.lerachlaw.com. On my firm’s website, Mr. Chen completed a certification form (attached hereto as Exhibit A) in which he set forth his transactions in Allot stock during the Class Period and indicated that he wished to be appointed as a lead plaintiff.

4. After reviewing Mr. Chen’s certification, I made several attempts to contact Mr. Chen through phone calls and e-mail. From the period of May 9, 2007 to July 2, 2007, I did not hear any response back from him.

5. Then, on July 12, 2007, I received a phone call from a person who identified himself as Alex Chen. During the course of our conversation, it became apparent to me that Alex Chen was

in fact the same person as Mr. Shichao Chen, who had completed a certification seeking appointment as lead plaintiff on my firm's website. Mr. Chen informed me that he had recently moved to New York from Beijing. I advised Mr. Chen that I had contacted him in response to the certification that he had completed on my firm's website and to confirm his interest in serving as a lead plaintiff in this Action. He then asked me what a lead plaintiff is and what role a lead plaintiff plays in the litigation. After explaining the role and responsibilities of a lead plaintiff, Mr. Chen explained that he would not be able to commit to such a role.

6. During this conversation, Mr. Chen also advised me that he had filled out a similar form, which I understood to be a certification, provided by the Kahn Gauthier Swick, LLC law firm, but that he had not spoken to anyone from that firm concerning this action.

DATED: July 20, 2007

/s/ Mario Alba, Jr.
MARIO ALBA, JR. (MA-7240)

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ALLOT COMMUNICATIONS

Service List - 7/20/2007 (07-0093)

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